

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of:)	
)	
2002 Biennial Regulatory Review --)	MB Docket No. 02-277
Review of the Commission's Broadcast)	
Ownership Rules and Other Rules)	
Adopted Pursuant to Section 202 of)	
the Telecommunications Act of 1996)	
)	
Cross-Ownership of Broadcast)	MM Docket No. 01-235
Stations and Newspapers)	
)	
Rules and Policies Concerning)	MM Docket No. 01-317
Multiple Ownership of Radio)	
Broadcast Stations in Local Markets)	
)	
Definition of Radio Markets)	MM Docket No. 00-244
)	
Definition of Radio Markets for)	MB Docket No. 03-130
Areas Not Located in an Arbitron)	
Survey Area)	

TO THE CHIEF, MEDIA BUREAU

MOTION TO EXTEND PAGE LIMITS ON RECONSIDERATION

The Diversity and Competition Supporters, identified in the Annex hereto, respectfully move for an order extending the page limitations contained in Section 1.429 of the Commission's rules. The page limitations sought herein are as follows:

<u>Name of Pleading</u>	<u>Page Limits In §1.429</u>	<u>Page Limits Sought Herein</u>
Petition for Reconsideration	25 pages	50 pages
Opposition to Petition for Reconsideration	25 pages	50 pages
Reply to Opposition to Petition for Reconsideration	10 pages	20 pages

Not only is this the most far-reaching and complex broadcast ownership proceeding in history, it is actually six interrelated proceedings rolled into one. If this proceeding had been set up

as six standalone dockets, any one of the dockets would have tested the parties' ability to concisely yet fully articulate their issues on reconsideration in 25 pages. For example, on reconsideration we will argue that at least fourteen of our significant proposals were either irrationally deferred or (in most instances) not even mentioned in the Report and Order, FCC 03-127 (released July 2, 2003), and that five substantive rulings failed to take into account important aspects of the problems being addressed. We cannot possibly illuminate these points coherently and thoroughly in a page or so apiece.

Robust proceedings on reconsideration conserve resources. By resolving issues that had been inadvertently or erroneously overlooked, they allow the agency to cure potentially reversible errors before judicial review is had. Thus, the Commission has not hesitated to relax the page limitations when parties seek reconsideration of extraordinarily complex decisions. For example, in 1996, the Commission issued Implementation of the Local Competition Provisions in the Telecommunications Act of 1996, CC Docket No. 96-98 (First Report and Order), 11 FCC Rcd 15499 (1996). What it lacked in controversy -- it was a unanimous decision -- it made up in bulk (754 pages, even longer than the 379-page Report and Order and Further NPRM in this proceeding.) MCI moved to extend the page limits for petitions for reconsideration to 50 pages, and the Common Carrier Bureau granted MCI's motion. Implementation of the Local Competition Provisions in the Telecommunications Act of 1996, CC Docket No. 96-98 (Order), 11 FCC Rcd 11882 (CCB 1996). See also Amendment of

Section 2.106 of the Commission's Rules to Allocate Spectrum at 2 GHz for Use by the Mobile-Satellite Service (Order), 12 FCC Rcd 6532 (OET 1997) (extending page limit for petitions for reconsideration without limitation where movant stated that it did not anticipate exceeding page limitation by more than twelve pages).

WHEREFORE, in light of the controversiality, complexity and importance of this proceeding, and the numerosity and significance of the issues, the Commission is respectfully requested to extend the page limitations for all parties as suggested herein.

Respectfully submitted,

David Honig

David Honig
Executive Director
Minority Media and
Telecommunications Council
3636 16th Street N.W.
Suite B-366
Washington, D.C. 20010
(202) 332-7005
dhonig@crosslink.net

Counsel for Diversity and
Competition Supporters

August 11, 2003

ANNEX

DIVERSITY AND COMPETITION SUPPORTERS

American Hispanic Owned Radio Association
Civil Rights Forum on Communications Policy
League of United Latin American Citizens
Minority Business Enterprise Legal Defense and Education Fund
Minority Media and Telecommunications Council
National Asian American Telecommunications Association
National Association of Latino Independent Producers
National Coalition of Hispanic Organizations
National Council of La Raza
National Hispanic Media Coalition
National Indian Telecommunications Institute
National Urban League
Native American Public Telecommunications, Inc.
PRLDEF-Institute for Puerto Rican Policy
UNITY: Journalists of Color, Inc.
Women's Institute for Freedom of the Press